



Responsible Gaming – Player Protection BetPoint Group

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Responsible Gaming – Introduction

Bet Point takes the issue of responsible gaming extremely seriously and we are dedicated to adopting a very clear position on the subject. We want everyone who enjoys playing our games to be entertained and in control.

Responsible gaming forms a fundamental part of our company's philosophy. We are committed to providing a safe, enjoyable responsible gaming facility and providing our clients with the highest levels of user protection.

We encourage a socially responsible attitude to gaming within our industry, both with our licensees and within our own company, as we proactively seek to avoid any gaming-related issues while providing our services both fairly and legally.

Bet Point is committed to working with gambling regulators and jurisdictions to ensure that our products are delivered and tested in line with the expectations of the regulatory authority, and that minors and other vulnerable people are not harmed or exploited by our products.

Whilst the majority of users will be unaffected by our products, we are aware as a socially responsible gaming and platform provider that we should take an active role in ensuring that we have taken all possible measures available to us to track, limit and prevent gambling from being a source of harm to the small number of users that may have developed a gambling problem.

Bet Point employs a number of ways to guarantee that it meets the expectations laid out by the regulators by implementing very clear policies procedures and practices and training in relation to problem gambling and responsible play. Our staff are subject to regular training on the subject and exposed to the available tools and independent third-party help organisations that exist to prevent gambling becoming an issue for the end user.

As a responsible and fair gaming operator there are a number of ways in which we can ensure we create a fair and safe environment in which our clients and users may enjoy our products and games. Including but not limited to the following:

- Improving awareness and educating users and clients on responsible gaming practices
- Protection of minors and other vulnerable individuals
- User protection and self-help tools
- Proactive detection of problem gaming issues
- Internal training and procedures
- External training and working with industry self-help organisations
- Reporting and regular audits



Protecting the Vulnerable and underage from gambling

Bet Point do not seek the custom from underage users, the vulnerable or those that are actively Self Excluded. We will actively seek to prevent them from gaining access to remote gambling at the point of account registration.

For those individuals that have identified they may require support to stop gambling, Bet Point have a variety of tools available to limit or stop the play as well as links to professional organisations that may be able to assist them.

Bet Point takes the issue of underage gambling very seriously and in compliance to our licensing requirements we will take all reasonable measures available to allow only those of the legal age (18 years +) to register a player account and wager real money.

As a socially responsible operator we will have effective policies, procedures and tools in place to prevent underage gambling and furthermore these tools will be regularly tested and audited. In line with our licensing conditions any marketing or advertising on our platform will not be targeted at minors and any will not include images of children or those whom appear to be under the age of 25 years.

Any marketing material and our platform including any terms and conditions will make it clear that underage gambling is illegal.

Bet Point will only accept business / registrations in accordance with licensing regulations. To uphold our strict adherence to gaming regulations and ensure that minors do not access our online products an effective registration process is adopted recording information pertaining to user registrations that records name, address and date of birth. This is then verified using an independent 3rd party KYC service provider.

Successful verification of age and address must be completed within 72 hours of first attempted deposit or wager. If verification cannot be satisfied by automatic means all reasonable endeavors will be undertaken including manual checks to pass verification. Should verification still not be possible within this timeframe then all necessary measures will be employed including blocking the user from continuing to play until verification has been secured this may be achieved by receipt of proof of age and identity documents. The withdrawal of any funds will cease until age and identity has been confirmed. An 18+ logo is prominently placed on the homepages of any client website that we operate and is visible during the account registration process.

Additionally, any websites associated with Bet Point will contain a tick box allowing users to positively accept and confirm that they are of the legal age to enter and enjoy the website.

In the event that any underage activity is detected and confirmed Bet Point or its associated websites will refund any transactions back to the nominated payment method refunded back via the nominated payment method. Bet Point will make a record of the underage user in order to prevent further attempts to play and report the incident to the relevant authorities.



Staying in Control

Bet Point wants users to enjoy our platform and encourages the promotion of responsible gaming and staying in control. In addition to the variety of tools that are available to allow for responsible playing we advocate the use of self-awareness questionnaires designed to assess the level of activity and lend to self-regulation.

Collaborating with independent charities and regulatory bodies the following list of control tools can be utilised to create an environment that allows safe gambling within limits:

- Account Deposit Limits
- Session Reminders
- Account Cool offs
- Account Self-exclusion
- Account Closures

Account Deposit Limits

Functionality can be set to allow self-imposed deposit limits during the initial account registration process before making any deposits on to a website and at any time thereafter to allow users to make an informed choice on their level of spend.

The period / duration of the limits on offer should:

- 24 hours
- 7 days
- One month

If limits are to be set across concurrent time frames e.g. a daily deposit and a weekly threshold the lowest limit should always apply.

Session Reminders

Bet Point adheres to and understands the remote gambling and software technical standards requirement of a responsible gaming system providing a 'reality check'. This should be an easily accessible session reminder which can be set at pre-determined time slots which will act as the aforementioned 'reality check' of the end user.

The session reminder should display the amount of time elapsed since a single gaming session has commenced. The end user (customer) is required to acknowledge this check for it to be removed from the screen.



The user should be offered the opportunity to create or amend a session check easily.
The session reminder should provide the following options:

Continue playing, this can be reset and will reappear once the pre- allotted time frame draws to an end.
Exit the game, meaning the current game would be closed and reset.

Account Time Outs

Licensees must offer an easily accessible 'time out' facility for end users / customers in which they can temporarily disconnect from playing or accessing their account for a pre-set period of time, this can range from between 24 hours and 6 weeks.

Time out requests should be activated with immediate effect and members will be unable to access the site until the time out has expired. Time out periods cannot be overridden.
Licensees must offer a time out facility for users for the following durations:

- 24 hours
- One week
- One month
- Up to maximum 6 weeks

Account Self-Exclusion

Self-exclusion is an industry recognised closure program whereby a user makes an informed decision and commitment to refrain from using online gambling facilities. As a socially responsible gaming provider Bet Point is committed to ensuring that this facility is available and upheld and this tool forms a core element of our Responsible Gaming policy.

The timeframe for opting to utilise a self-exclusion can be between 6 months to 5 years.

Once authorised, it is not possible for any closure requests to be overridden during the course of the exclusion period, any funds on a customer account must be returned at this stage.

Only after the period of self-exclusion has expired can the user request to reopen their account. At the point a user chooses to be self-excluded further account control settings are updated on our gaming platform to ensure self-excluded individuals do not receive targeted marketing or promotional materials. Self-exclusion is an agreement whereby the customer and operator agree that the user should refrain from gambling for the set period of time and by doing so should not create any further accounts with the operator. Additionally, the operator should employ all reasonable measure to ensure that the user has not been able to get on the site and create any new accounts. We take responsible gambling very seriously and if you try to open other accounts with us during your period of exclusion we will do our best to detect and close them.

Upon expiry of the self-exclusion period, should a user wish to reopen their account then this request should be considered by the operators trained staff. Any such request to re-join will be subject to a 24-



hour cooling off period, in which the account will be fully examined before approval may be granted. Bet Point reserves the right to close a user's account at any time if it believes that it is in the best interests of both the customer and the operator.

General Account Closures

Accounts held on the Bet Point platform may be closed by the user at any time for any reason. Any available funds that the user is entitled to will be returned to the registered active payment method in accordance to our Anti Money Laundering policy and the sites general terms and conditions. If you decide to close your account, you can do so by contacting our friendly customer service team via telephone or by LiveChat.

Bet Point reserves the right to temporarily suspend or permanently close a user account at any time in accordance with our general terms and conditions and if it is found that the account has breached specific policies or events including but not limited to the following:

- Bonus Abuse
- Fraud
- Suspicious transactions
- Collusion
- Money Laundering
- Use of robots
- Underage usage
- Breach of Self Exclusion
- Misuse or manipulation of any fault or error in our software

Self Help Organisations

Bet Point is committed to working within a socially responsible environment and has links to independent third parties functioning within the jurisdiction that we operate and hold a licence in. Any website that Bet Point operates will have clear links and contact details for a number of self-organisations on its websites where users can find further information, help and support for gambling related problems.

A proactive stance towards controlling play and spend should be included on all affiliated websites including the following approved questions depicting that gambling has become an issue rather than a pleasurable experience:

- spending more money and time on gambling than you can afford
- finding it hard to manage or stop your gambling
- having arguments with family or friends about money and gambling
- losing interest in usual activities or hobbies like going out with friends or spending time with family



- always thinking or talking about gambling
- lying about your gambling or hiding it from other people
- chasing losses or gambling to get out of financial trouble
- gambling until all of your money is gone
- borrowing money, selling possessions or not paying bills in order to pay for gambling
- needing to gamble with larger amounts of money or for a longer time to get the same feeling of excitement or buzz
- neglecting work, family, personal needs or household responsibilities because of gambling
- feeling anxious, worried, guilty, depressed or irritable.



VERSION MANAGEMENT

Summary of key changes	By	Date
Initial draft	Compliance Department	21 June 2018